

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:** ) **CHAPTER 13**  
**MONICA LAKISHA DUGGINS** ) **CASE: A18-62649-JWC**  
 )  
 )  
 )  
**DEBTOR** )

**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION  
AND MOTION TO DISMISS CASE**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Debtor's payments under the proposed plan are not current, thus indicating that this plan is not feasible. 11 U.S.C. Section 1325(a)(6).

2.

The Chapter 13 schedules fail to include complete employment information for the Debtor, thereby preventing the Trustee from evaluating the feasibility of the Chapter 13 plan in violation of 11 U.S.C. Section 1325(a)(6).

3.

The Chapter 13 schedules fail to reflect the Debtor's roommate contribution income, thereby preventing the contribution of all projected disposable income to this plan in possible violation of 11 U.S.C. Section 1325(b)(1)(B).

4.

The Debtor's Schedule I fails to accurately reflect all payroll deductions, thereby preventing the Chapter 13 Trustee from determining the feasibility of the proposed plan in violation of 11 U.S.C. Section 1325(a)(6).

5.

After review of scheduled income and anticipated household expenses, Debtor's proposed budget may fail to provide sufficient funds for ordinary living expenses in possible violation of 11 U.S.C. Section 1325(a)(6).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

This the 17th day of September, 2018.

Respectfully submitted,

/s/

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Ryan J. Williams  
Attorney for the Chapter 13 Trustee  
State Bar No. 940874

**CERTIFICATE OF SERVICE**

Case No: A18-62649-JWC

This is to certify that I have this day served the following with a copy of the foregoing Chapter 13 Trustee's Objection To Confirmation And Motion To Dismiss Case by depositing in the United States mail a copy of same in a properly addressed envelope with adequate postage thereon.

**Debtor(s)**

MONICA LAKISHA DUGGINS  
4099 ROBIN CIRCLE  
ATLANTA, GA 30349

**By Consent of the parties**, the following have received an electronic copy of the foregoing Chapter 13 Trustee's Objection To Confirmation And Motion To Dismiss Case through the Court's Electronic Case Filing system.

**Debtor(s) Attorney:**

THE SEMRAD LAW FIRM, LLC  
rjsatlcourtdocs@gmail.com

This the 17th day of September, 2018.

/s/ \_\_\_\_\_  
Ryan J. Williams  
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